

# **EXHIBIT B**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

AUTHORS GUILD, et al.

Plaintiffs,

v.

OPEN AI INC., et al.,

Defendants.

**ECF CASE**

No. 1:23cv-08292-SHS-OTW

No. 1:23-cv-10211-SHS-OTW

JONATHAN ALTER, et al.

Plaintiffs,

v.

OPEN AI INC., et al.,

Defendants

**DEFENDANT MICROSOFT  
CORPORATION'S RESPONSES AND  
OBJECTIONS TO PLAINTIFFS'  
THIRD SET OF  
INTERROGATORIES**

**CONTAINS INFORMATION  
DESIGNATED AS CONFIDENTIAL  
UNDER THE PROTECTIVE ORDER**

**MICROSOFT CORPORATION'S RESPONSES TO PLAINTIFFS' THIRD SET OF  
INTERROGATORIES**

Pursuant to Federal Rule of Civil Procedure 33, Microsoft Corporation responds to Plaintiffs' Third Set of Interrogatories to Microsoft as follows:

**GENERAL OBJECTIONS**

Microsoft's responses are subject to the following objections to the "Definitions" and "Instructions" provided with the Interrogatories, each of which is hereby incorporated by reference into Microsoft's responses below. If Microsoft objects to a definition of a term and that term is used in the definition of a subsequent term, Microsoft's objections to the term used in the subsequent definition are incorporated by reference therein.

**INTERROGATORY NO. 8:**

Identify anyone at Microsoft who had communications Regarding and Concerning Library Genesis or Libgen, Internet Archive, Z-Library, Common Crawl, WebText, Project Gutenberg, Anna's Archive, Open Library, Reddit, DuXiu, and E-Libra.

**RESPONSE TO INTERROGATORY NO. 8:**

Microsoft incorporates by reference and reasserts its General Objections to Plaintiffs' "Definitions" set forth above. Microsoft objects to this Interrogatory as irrelevant and/or vague, ambiguous, overly broad, and not proportional to the needs of the case because it requests information concerning "anyone" at Microsoft who had such communications, without limitation as to time, scope, or purpose. Microsoft further objects to this Interrogatory as irrelevant and/or vague, ambiguous, overly broad, and not proportional to the needs of the case because it requests information that does not bear any relation to the allegations and conduct alleged in these Actions and/or to any claim or defense in these Actions. Microsoft further objects to this Interrogatory as

compound and constituting at least eleven (11) interrogatories under Federal Rule of Civil Procedure 33(a)(1) because it has discrete subparts seeking discrete categories of information, including information about Microsoft individuals who communicated regarding eleven (11) different topics. Microsoft also objects to this Interrogatory to the extent it seeks information that is subject to the attorney-client privilege, work product doctrine, joint defense privilege, common interest protection, or any other applicable privilege, immunity, or protection provided by law, or that are trial preparation materials.

Subject to these objections, Microsoft states as follows: Microsoft will not provide a response to this Interrogatory.

Dated: February 28, 2025

Respectfully submitted,

/s/ Jared B. Briant

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**PROOF OF SERVICE VIA ELECTRONIC MAIL**

On February 28, 2025, per the parties' agreements, I directed **DEFENDANT MICROSOFT CORPORATION'S RESPONSES TO PLAINTIFFS' THIRD SET OF INTERROGATORIES** to be served via electronic mail upon:

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